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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/22/2025

MEMORANDUM ENDORSED

May 20, 2025

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Telebrands Corp. and Ningbo Fine Source Imp&Exp Co., Ltd*
Case No. 25-cv-1557 (GHW)
Request to Indefinitely Adjourn the Deadline to Submit Joint Letter and Proposed Case Management Plan and the Initial Pretrial Conference

Dear Judge Woods,

We represent Plaintiff Telebrands Corp. (“Plaintiff”) in the above-referenced action (the “Action”).¹ On February 27, 2025, the Court scheduled the Initial Pretrial Conference for May 29, 2025 at 3:00 p.m. (Dkt. 13). For the reasons set forth herein, Plaintiff respectfully requests that the Court indefinitely adjourn the deadline for the parties’ joint letter and Proposed Case Management Plan along with the Initial Pretrial Conference. In accordance with Your Honor’s Individual Rules of Practice, Plaintiff submits the following:

1. **Original Due Date:** Currently, the deadline to file the parties’ joint letter and Proposed Case Management Plan is May 22, 2025 and the Initial Pretrial Conference is currently scheduled for May 29, 2025 at 3:00 p.m.
2. **The number of previous requests for adjournment:** None, this is Plaintiff’s first request to indefinitely adjourn the deadline to file the joint letter and Proposed Case Management Plan and the Initial Pretrial Conference.
3. **The reason for the current request:** Plaintiff respectfully requests an indefinite adjournment of the deadline to file the joint letter and Proposed Case Management Plan and the Initial Pretrial Conference because Defendant, having been served on March 4, 2025, should have filed an Answer or Rule 12 Motion on or before March 25, 2025. To date, Defendant has neither filed with the Court nor served upon Plaintiff any Answer or Rule 12 Motion, nor contacted Plaintiff or indicated any intention of otherwise appearing in the Action. Accordingly, there is presently no appearing party in this Action for Plaintiff to enter into a Case Management Plan with.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

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4. **Whether the adversary consents:** Given that Defendant is in default, Plaintiff did not seek Defendant's consent.
5. **Proposed alternative dates:** N/A.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

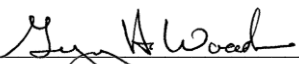
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Application granted in part. The initial pretrial conference scheduled for May 29, 2025 is adjourned to July 28, 2025 at 3:00 p.m. The deadline for the parties to file the joint letter and proposed case management plan outlined in the Court's February 27, 2025 order is extended to July 21, 2025. The Court expects that any application for an order to show cause why default judgment should not be entered against Defendant, in full compliance with Attachment A to the Court's Individual Rules, will be filed no later than June 30, 2025. Plaintiff is directed to serve a copy of this order on Defendant and to retain proof of service. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 27.

SO ORDERED.

Dated: May 22, 2025

New York, New York



GREGORY H. WOODS
United States District Judge